

C. Frank Harscher, III  
Secretary



|        |             |
|--------|-------------|
| Site:  | A.L. Taylor |
| Break: | 2.4         |
| Other: |             |

Julian M. Carroll  
Governor

COMMONWEALTH OF KENTUCKY  
DEPARTMENT FOR NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION  
BUREAU OF ENVIRONMENTAL PROTECTION  
DIVISION OF SANITARY ENGINEERING  
CENTURY PLAZA  
1065 U.S. 127 BYPASS SOUTH  
FRANKFORT, KENTUCKY 40601

M E M O R A N D U M

October 23, 1979

TO: Members of the Hazardous Waste Policy Task Force

FROM: Nick G. Johnson, Director *NGJ*  
Division of Sanitary Engineering

SUBJECT: Addition to Case History -- A. L. Taylor Site  
(Valley of the Drums)

Attached, please find comments for possible inclusion in the above subject case history from Mr. Roger W. Conn, District Engineer. Mr. Conn, along with Mr. Kenneth Howard of our Division, assisted two EPA Representatives from Atlanta on their door to door survey of homes within one mile radius of the A. L. Taylor site to ascertain the sources of drinking water.

NGJ:oc

cc: Jack A. Wilson

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OCT 25 1979  
OFFICE OF  
GENERAL COUNSEL



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October 23, 1979

TO: Nick G. Johnson, Director *NJ*  
Division of Sanitary Engineering

FROM: *RWC* Roger W. Conn, District Engineer

SUBJECT: Addition to Case History--A. L. Taylor Site  
(Valley of the Drums)

After reviewing the case history of the Valley of the Drums (copy attached), I have the following addition that you may wish to include:

On January 22, 1979, representatives from EPA, Water Supply Branch, and the Kentucky Division of Sanitary Engineering conducted a door to door survey of the homes within a 1 mile radius of the A. L. Taylor site. The purpose of the survey was to determine the location of any private water supplies within this area. All homes within this area are served by the Louisville Water Company except for 2 homes that have wells. One well is located at a trailer near the junction of Highway 1020 and the railroad tracks, approximately 1/2 mile from the dump site going towards Brooks. The other well is located on a farm across Highway 1020 and approximately 1/4 mile towards Brooks.

A.L. TAYLOR SITE (VALLEY OF THE DRUMS) - CASE HISTORY

The A.L. Taylor site, commonly referred to as the Valley of the Drums, is located approximately 1/4 mile south of the Jefferson Co. - Bullitt Co. line just off Park Rd. near Brooks, Ky. Although the total acreage of the site comprises 15 - 20 acres, there were approximately 10 acres contaminated and littered with drums. This acreage has since been reduced somewhat as a result of the site inventory and limited clean-up conducted in March of 1978.

The initial investigation of the A.L. Taylor site was made December 13, 1967. A joint investigation of open burning at the site was made by representatives of the Solid Waste Program and Air Pollution Control Program. Industrial wastes were also observed lying over the area. At that time Mr. Taylor stated that he had purchased more land and intended to operate a sanitary landfill. Mr. Taylor was supplied with information on operating a sanitary landfill. Another documented visit was made a little over a year later <sup>AT</sup> which time it was noted that the area continued to burn and the site was in poor condition.

In 1975, the Division of Water Quality became involved as the result of a complaint. Several inspections of the site made by Water Quality personnel between November 1975 and April 1976 showed runoff from the site had produced an oily sheen and discoloration of nearby Wilson Creek. On one occasion, employees of A.L. Taylor were observed pouring liquids from drums toward an area which drained toward Wilson creek approximately 50 ft. away. On February 5, 1979, the case was submitted to the Office of General Counsel by the Division of Water Quality for legal action. A hearing date was set for April 23, 1976, however, neither Mr. Taylor nor

his representative appeared and a report was not rendered by the hearing officer.

An effort was made by the Division of Hazardous Materials and Waste Management in May 1977 to determine if the site was being used as a disposal site or for storage purposes only. The site was visited on May 23, 1977. The presence of 15,000 - 20,000 drums, most of them empty, was noted and though there was no evidence of prior burial, Mr. Taylor was on site and in the process of digging a trench, supposedly, for the disposal of unsaleable drums. He was again told that operation of such a disposal site required a permit from the Division. Mr. Taylor said he would cease operation and come to Frankfort the next week to discuss obtaining a permit. Mr. Taylor came to Frankfort on May 25, 1977 and discussed procedures for obtaining a permit and indicated he would make application. Application for permit was never made by Mr. Taylor. As consequence thereof, a recommendation was made by field personnel that appropriate action be initiated by the Frankfort office. A June 7, 1977 inspection showed no activity at the site.

Evidence that drums were being buried at the site was obtained in October, 1977. A certified letter was sent to Mr. Taylor on November 14, 1977, formally notifying Mr. Taylor that he was operating in violation of KRS 224.225 and KRS 224.880. He telephoned the next day requesting another application form; however, no additional contact was made by Mr. Taylor to discuss his intentions for the site nor was an application submitted.

A recommendation for legal action was made by field personnel as the result of a November 17, 1977, inspection. The inspection revealed that the trench containing drums noted in an earlier inspection, May 23, 1977, had

been filled and covered, as well as numerous leaking drums which were observed on the surface. The case was officially referred to the Office of General Counsel on November 30, 1977, by memorandum.

A related internal memo dated November 29, 1977 indicated that hazardous and flammable materials from the Ky. Liquid Recycling, Inc. warehouse located at 21st and Rowan Ave., Louisville, had been transferred to the A.L. Taylor site.

More visits were made to the site in early December at which time the industries marked on the drums were noted and contacted. Kurfee Coatings indicated they were under the impression Mr. Taylor operated a permitted landfill and when informed Mr. Taylor was in fact operating an illegal site, offered to pick up their drums and return them to the plant.

Although there appeared to be no further evidence of disposal operations at the site, a February 22, 1978, inspection showed no improvement in the condition of the site. Meanwhile, Mr. Taylor died in February, 1978, leaving the estate to his widow, Mrs. Nell Taylor.

A strong memorandum was written by field personnel on May 19, 1978, stating "an obvious environmental and public health hazard" existed and requested "immediate legal action be taken to restrain activity at this site and that additional legal action be initiated to effect a complete clean-up of the disposal area". Large amounts of runoff and overflow from partially filled drums and two large contaminated ponds had been generated by heavy spring rains and had wound its way through the site into nearby Wilson Creek.

Drum and water samples were taken by the Division on January 12, 1979, and analyzed by Agriculture and State Police laboratories. Results showed

contamination by several organic solvents - methyl ethyl ketone, toluene, ethyl benzene, butyl alcohol, and xylene. Tests for chlorinated pesticides, hexachlorocyclopentadiene, and PCB residues proved negative.

An administrative complaint was filed by the Department against Mrs. Taylor on January 22, 1979, and a hearing date was set for February 22, 1979. An amended complaint against Mrs. Taylor, doing business as A.L. Taylor Drum Cleaning Service, individually as a representative of the A.L. Taylor estate was served on March 21, 1979, at which time the state presented its case. An interim status report has since been issued by the Office of General Counsel.

On March 2, 1979, the EPA Environmental Response Team responded to a report that oil and other chemicals were entering Wilson Creek from the Taylor property. In accordance with Section 311 of the Federal Water Pollution Control Act, Oil and Hazardous Materials, Inc. were contracted by EPA to control contamination from the site. An underflow dam was constructed on Wilson Creek, in an attempt to contain contaminants. A pond was excavated at the lower end of the site to catch runoff from ditches and trenches dug to divert surface water. Aeration units were placed in the creek. A filtration system was also installed to treat discharge from the catch pond. A 99.2% reduction of contaminants was obtained in the treatment system effluent according to reports issued by the U.S. EPA.

An inventory of drums was taken. Drums were repositioned and segregated as to their contents - liquids, solids, empties (in condition to be recycled), and unknowns. March 21, 1979, figures indicate a total of 17,051 drums, 11,200 of which were empty and unsaleable. These drums were crushed and left in piles on the site. Of the remaining 5,851,

2,854 contained solids, 1,846 contained liquids, 376 were empty, but in condition to be recycled, and 775 were unmarked. The number of drums with a particular manufacturer's label was also noted when discernible.

Water and soil samples were taken during this time at various locations at or downstream from the site. Analytical work performed by Environmental Consultants, Inc. of New Albany, Indiana revealed detectable amounts of a wide variety of organic solvents, heavy metals, and in one sample, 0.313 ppm (wet basis) PCB 1260. Additional samples were taken on April 18, 1979, by EPA personnel. Twelve small trenches were dug and core samples taken. Two of the digs unearthed buried drums and in eight digs, liquids were detected at a depth of 2-3 feet. These samples were analyzed by EPA's laboratory in Athen, Georgia for PCB's and pesticides. Chlorinated pesticides were not found except for one sample in which 1.7 ug/l of 1,2,4-Trichlorobenzene was detected. PCB's were detected in seven of the 10 samples.

EPA and Oil and Hazardous Materials, Inc. left the site around March 20, 1979. Field personnel with the Division of Hazardous Materials and Waste Management maintained and still continue to maintain on a daily basis, the treatment system for the catch pond effluent.

A total of 655.5 man hours were spent by the Division of Hazardous Materials alone in direct support of the March clean-up activities. Costs, including salaries, travel, safety equipment and supplies, for the Department total \$7,163.23, with an additional \$1,121.28 spent on laboratory analyses for a grand total of \$8,284.51.